



United States Department of Justice

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April 11, 2024

Via ECF

Hon. Lawrence E. Kahn
Senior U.S. District Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 424
Albany, New York 12207

Re: *United States v. Mann*, 1:20-CR-199 (LEK)

Dear Judge Kahn:

I write to respectfully ask for an eleventh 90-day deadline extension to fully identify the victims who are entitled to restitution in this case. The current deadline is April 15, 2024.

The Court sentenced Michael Mann on August 4, 2021, and entered judgment on August 12. The Court ordered restitution but deferred the determination of all victims for a period of 90 days, as the Government requested more time to identify victims given the complexity of the fraud. The judgment provided that “[t]he government shall file a request with the Court if additional time is needed beyond the 90 day period to fully identify the restitution payees.”

The Government respectfully asks for an eleventh 90-day deadline extension, measured from today’s date, to fully identify victims to the Court so that an amended judgment can be entered. The Court has approved ten such previous requests by the Government, setting a compliance deadline of April 15, 2024. Dkt. no. 154.

The reason for the request is the same, namely the pendency of numerous lawsuits and motions whose resolution would facilitate the full identification of victims and the amount each victim is owed. *See, e.g.,* Southwestern Payroll Service, Inc. v. Pioneer Bancorp, 19-cv-1349 (FJS).¹ These matters also include third-party claims to seized assets, filed in this very case by Pioneer Bank and Cachet Financial Services.

¹ Another such case, *United States v. Pioneer Bank*, 20-cv-487 (DNH), was recently settled.

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Thank you for your attention to this matter.

Respectfully submitted,

/s/ Michael Barnett
Assistant U.S. Attorney